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7 *City of Henderson, Nevada*  
*Henderson Police Department and*  
8 *Chief Thedrick Andres*

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**DISTRICT COURT**  
**CLARK COUNTY, NEVADA**

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13 MICHAEL LEWIS, Individually and as  
Administrator of the Estate of KEVIN LEWIS,  
14 Deceased; MICHAEL LEWIS as Guardian Ad  
Litem of LUKE ARTHUR LEWIS, a minor,  
15 and EMBER LYNN LEWIS, a minor, as heirs  
of the Estate of KEVIN LEWIS, Deceased,

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Plaintiff,

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vs.

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CITY OF HENDERSON, NEVADA, a  
political subdivision of the State of Nevada;  
HENDERSON POLICE DEPARTMENT, a  
political subdivision of the State of Nevada;  
THEDRICK ANDRES, individually and as  
policy maker and Chief of CITY OF  
HENDERSON POLICE DEPARTMENT;  
DOE HENDERSON POLICE OFFICERS I  
through X; LAS VEGAS METROPOLITAN  
POLICE DEPARTMENT, a political  
subdivision of the State of Nevada; SHERIFF  
JOE LOMBARDO, individually and as policy  
maker of LAS VEGAS METROPOLITAN  
POLICE DEPARTMENT; DOE LAS VEGAS  
METROPOLITAN POLICE DEPARTMENT  
OFFICERS, I through X; DOES I through X;  
and ROE ENTITIES, I through X, inclusive,

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Defendants.

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CASE NO. 2:21-cv-1128-APG-VCF

**DEFENDANTS CITY OF HENDERSON,  
NEVADA, HENDERSON POLICE  
DEPARTMENT AND CHIEF THEDRICK  
ANDRES' STIPULATION AND ORDER  
FOR EXTENSION OF TIME TO FILE A  
RESPONSE TO PLAINTIFFS'  
COMPLAINT**

1                   **DEFENDANTS CITY OF HENDERSON, NEVADA, HENDERSON**  
2                   **POLICE DEPARTMENT AND CHIEF THEDRICK ANDRES'**  
3                   **STIPULATION AND ORDER FOR EXTENSION OF TIME TO**  
4                   **FILE A RESPONSE TO PLAINTIFFS' COMPLAINT**

5                   COME NOW, the parties, by and through their undersigned counsel of record and hereby  
6                   stipulate and agree that the time for City of Henderson, Nevada, Henderson Police Department,  
7                   and Chief Thedrick Andres to file their response to Plaintiffs' Complaint, said response being due  
on July 29, 2021 be extended until August 13, 2021.

8                   **Reason for Extension**

9                   Because of the complexity of the claims made in Plaintiffs' Complaint, Defendants require  
10                  additional time to perform an investigation prior to filing a responsive pleading. This stipulation  
11                  is made in good faith and not for the purpose of delay.

12                  This is the first extension of time requested by counsel for filing Defendants response to  
13                  Plaintiffs' Complaint.

14                  Dated this 2<sup>nd</sup> day of August, 2021.

15                  Dated this 2<sup>nd</sup> day of August, 2021.

16                  LEWIS BRISBOIS BISGAARD & SMITH LLP

17                  GERALD I. GILLOCK & ASSOCIATES

18                  */s/ Robert W. Freeman*  
19                  ROBERT W. FREEMAN  
20                  Nevada Bar No. 3062  
21                  E. MATTHEW FREEMAN  
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24                  Las Vegas, Nevada 89118  
25                  Attorney for Defendants  
26                  City of Henderson, Nevada  
27                  Henderson Police Department and  
28                  Chief Thedrick Andres

16                  */s/ Gerald I. Gillock*  
17                  GERALD I. GILLOCK  
18                  Nevada Bar No. 51  
19                  MICHAEL H. COGGESHALL  
20                  Nevada Bar No. 14502  
21                  428 South Fourth Street  
22                  Las Vegas, Nevada 89101  
23                  Attorneys for Plaintiffs

24                   **ORDER**

25                  IT IS SO ORDERED.

26                  Dated this 2nd day of August, 2021.



27                  CAM FERENBACH  
28                  United States Magistrate Judge